A.C. 42469

APPELLATE COURT

JUDITH KISSEL

VS.

STATE OF CONNECTICUT

CENTER FOR WOMEN'S HEALTH, P.C.

et al.

**DECEMBER 31, 2019** 

## MOTION FOR EXTENSION OF TIME, ON CONSENT

Pursuant to Practice Book §§ 66-1 and 66-2, Defendant-Appellant Reed Wang moves for a 14-day extension of time until January 23, 2020 to file his reply brief. Defendant-Appellant's brief is currently due on January 9, 2020. The Plaintiff and Defendants Center for Women's Health and Wabbo **consent** to the granting of this motion.

#### I. BRIEF HISTORY

The Plaintiff brought this action for medical malpractice and products liability. The jury found for the Plaintiff, and the trial court (Povodator, J.T.R.) denied the Defendants' post-judgment motions. Defendant Wang appealed on January 10, 2019.

### II. SPECIFIC FACTS

The Plaintiff filed her brief as Appellee on November 20, 2019 after numerous extensions were granted. Defendant Wang's brief is currently due on January 9, 2020, after one extension. Some drafting has taken place on the reply brief. However, additional time is necessary for the review by various counsel, which is complicated by holiday vacation schedules. The undersigned estimates that an additional two weeks should suffice to complete the reply brief.

### III. LEGAL GROUNDS

Practice Book § 66-1(c) authorizes extensions of filing deadlines for good cause shown. The facts set forth herein demonstrate good cause.

DEFENDANT, REED WANG

Bv:

Wesley W. Horton Kenneth J. Bartschi

HORTON, DOWD, BARTSCHI & LEVESQUE,

P.C.

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# CERTIFICATION

I hereby certify that the foregoing Motion for Extension of Time conforms to the formatting requirements set forth in Practice Book § 66-3. I further certify in accordance with the provisions of § 62-7 that (1) a copy has been delivered to each other counsel of record; (2) the document has been redacted or does not contain any names or other personal identifying information or case law; and (3) that the document complies with all applicable rules of appellate procedure.

In addition, I certify that a copy of the foregoing was e-mailed to our client **Defendant-Appellant, Reed Wang**, and the following counsel of record on December 31, 2019 pursuant to § 62-7(c).

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